


**Compass Bancshares**
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**2002 APR 10 A 9 45**

 Compass Bancshares, Inc.  
 P.O. Box 16606  
 Birmingham, Alabama 35296

April 9, 2002

 Jerry W. Powell  
 General Counsel

Via UPS Overnight Mail and Facsimile 202/219-3496

 Mr. John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division  
 Federal Election Commission  
 999 E Street NW  
 Washington, D. C. 20004

Identification Number: C00142596

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Gibson:

This letter is a response to your letter of March 21, 2002 requesting a response to your notice dated January 16, 2002 relating to contributions to the Culberson for Congress Campaign. First, let me apologize for the delay in responding to your January 16, 2002 letter; we cannot find where we received the original letter.

We have requested and received a refund from the Culberson campaign of the three contributions at issue which total \$5,000. A copy of the check dated March 27, 2002 is attached and the refund will be disclosed on line 16 of Schedule A in our next report.

My investigation has revealed that the contribution to the Culberson for Congress in January 2001 was intended for debt retirement; however, the debt was with respect to the primary run-off campaign in the year 2000 and not the general election. We were not aware that our contribution had been misdesignated until your letter was received this year; therefore, we were not able to seek written authorization for the redesignation of the contribution pursuant to 11CFR §110.2(b) within the sixty days of the treasurer's receipt. Unfortunately, this is the result of a miscommunication within our organization, since I have learned that the Culberson campaign treasurer notified an employee of Compass Bank in Houston, Texas, that the contribution had been misdesignated. The Compass Bank employee did not bring the matter to the attention of Ms. Brewis, Compass BANCAPAC Treasurer, or me, Chairman of the Distribution Committee.

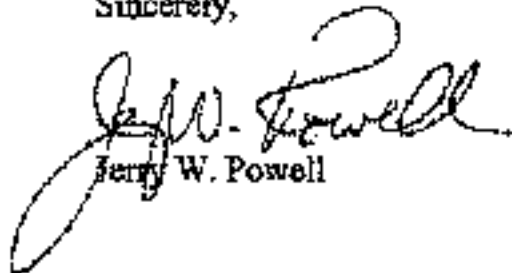
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Mr. John D. Gibson  
April 9, 2002  
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Compass BANC PAC has been a multi-candidate political action committee registered with the Federal Election Commission for approximately twenty years and we regret the error in the mid-year report for January - June 2001. We have taken steps to correct the communication issues within our company and trust that an error like this will not recur.

Please let me know if you require additional information regarding this matter.

Sincerely,



Jerry W. Powell

JWP/dnt

cc: Sue Brewis

Enclosure

2002 APR 11 10:41 AM  
FBI - NEW YORK  
COMM-FBI  
2002 APR 11 10:41 AM

CULBERSON FOR CONGRESS 08100  
 14138 MEMORIAL DR. STE. 3 281-490-1407  
 HOUSTON, TX 77058

1594

35-1125/1100

PAY  
 TO THE  
 ORDER OF

*Congressman*  
*The Memorial*

DATE *3-27-02*

\$ *500.00*

DOLLARS *00*

**SOUTHWESTERN  
 SOUTHERN  
 NATIONAL**

*Refund of misallocated contribution*

*[Signature]*

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## Federal Election Commission

# **ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.



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PREPARER

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